Assessment			Assessment Date -		Assigned By(Action		Assurance Product	Assurance Product Title	Hierarchy Level 0
D	Finding ID	Action ID	Julian	Julian	Item)	Assurance Provider	Assurance Product	Assurance Product Title	nierarchy Level 0
119359	546761	546763	7/28/2011	9/20/2011	Pamela Nelson	Assurance: Business Mgmt Self Assessment	BMSA: Compliance Review (Cat2)	2011 PSM/RMP Compliance Audit	Global Assurance
119359	546764	546765	7/28/2011	9/20/2011	. Pamela Nelson	Assurance: Business Mgmt Self Assessment	BMSA: Compliance Review (Cat2)	2011 PSM/RMP Compliance Audit	Global Assurance
	310701	3.0763	7,20,202	, , , , , ,					
119359	546764	546766	7/28/2011	9/20/2011	Pamela Nelson	Assurance: Business Mgmt Self Assessment	BMSA: Compliance Review (Cat2)	2011 PSM/RMP Compliance Audit	Global Assurance
124994	576565	576593	7/28/2011	1/23/2012	Dawn Shanahan	Assurance: Local	Local: Miscellaneous (Cat3)	2011 PSM/RMP Compliance Audit	Global Assurance
124994	576585	576588	7/28/2011	1/23/2012	Dawn Shanahan	Assurance: Local	Local: Miscellaneous (Cat3)	2011 PSM/RMP Compliance Audit	Global Assurance
124994	576585	5 576617	7/28/2013	1 1/23/2012	2 Dawn Shanahan	Assurance: Local	Local: Miscellaneous (Cat3)	2011 PSM/RMP Compliance Audit	Global Assurance
158316	836273	8 836275	5/16/2014	4 2/10/2015	5 Tone Martin	Assurance: Local DS	Local DS: HSE Review (Cat3)	2014 PSM/RMP Regulatory Compliance	Shell Assurance

Javier Morales
RMP Coordinator
US EPA Region 10
1200 6th Ave., Suite 900, OCE-094

EPA Region 10 Deemed Releasable

BUSINESS CONFIDENTIAL INFORMATION



Hierarchy Level 1	Hierarchy Level 2	Hierarchy Level 3	Hierarchy Level 4	Function (Assurance)	Country (Assurance)	Assurance Coordinator (Action Item)	Auditee Name	Action Party	Category Names - Findings
Assurance - DS	DS Manufacturing	Assurance - DS: Manufacturing: Puget Sound	Manufacturing: Puget Sound	Not functionally specific	USA		Tom Rizzo	Thomas Braaten	
Assurance - DS	DS Manufacturing	Assurance - DS: Manufacturing: Puget Sound	Manufacturing: Puget Sound	Not functionally specific	USA		Tom Rizzo	Dean Overman	
Assurance - DS	DS Manufacturing	Assurance - DS: Manufacturing: Puget Sound	Manufacturing: Puget Sound	Not functionally specific	USA		Tom Rizzo	Jaylynn Jackson	
Assurance - DS	DS Manufacturing	Assurance - DS: Manufacturing: Puget Sound	Manufacturing: Puget Sound	Not functionally specific	USA		Tom Rizzo	Thomas Braaten	,
Assurance - DS	DS Manufacturing	Assurance - DS: Manufacturing: Puget Sound	Manufacturing: Puget Sound	Not functionally specific	USA		Tom Rizzo	Dean Overman	
Assurance - DS	DS Manufacturing	Assurance - DS: Manufacturing: Puget Sound	Manufacturing: Puget Sound	Not functionally specific	USA		Tom Rizzo	Jaylynn Jackson	
Assurance - DS	DS Manufacturing	Puget Sound	Puget Sound	Not functionally specific	USA	Tone Martin	Tom Rizzo	Kelly Tuohig	



Finding Severity	Finding RAM Rating	Finding Short Description	Finding Note	Action Short Description
			The Hot Work Permit form did not contain a space to note that the requirement to	
Low		PSR Hot Work Permits	relocate or otherwise protect combustible materials that were within 35 feet of the hot work activity, was satisfied, if applicable.	PSR Hot Work Permits
			A description of the inspection or test performed was not noted on some equipment inspection and testing records: • In one instance, the record of the test did not indicate	
			what test standard was used. (equipment record checked 03PIS10) • In one instance, the	
			record of the test indicated the calibration standard used, however, it was different than	1
			the calibration standard listed in the test document. (The test record did not indicate	
Low		PSR Mechanical Integrity	why a different calibration standard was used).	PSR Mechanical Integrity PEI
			A description of the inspection or test performed was not noted on some equipment	5
			inspection and testing records: • In one instance, the record of the test did not indicate	
			what test standard was used. (equipment record checked 03PIS10) • In one instance, the	
			record of the test indicated the calibration standard used, however, it was different than	
			the calibration standard listed in the test document. (The test record did not indicate	PSR Mechanical Integrity
Low		PSR Mechanical Integrity	why a different calibration standard was used).	MEI
			The Hot Work Permit form did not contain a space to note that the requirement to	8
		DCD Llat Work Dormits	relocate or otherwise protect combustible materials that were within 35 feet of the hot	PSR Hot Work Permits
Low		PSR Hot Work Permits	work activity, was satisfied, if applicable. Taken from #546764 which was entered incorrectly. A description of the inspection or	F3K HOL WOLK FEITHILS
			test performed was not noted on some equipment inspection and testing records: • In	
			one instance, the record of the test did not indicate what test standard was used.	
			(equipment record checked 03PIS10) • In one instance, the record of the test indicated	
			the calibration standard used, however, it was different than the calibration standard	
,			listed in the test document. (The test record did not indicate why a different calibration	DCD March and reliable points DEL
Low		PSR Mechanical Integrity	standard was used).	PSR Mechanical Integrity PEI
			Taken from #546764 which was entered incorrectly. A description of the inspection or	
			test performed was not noted on some equipment inspection and testing records: • In	
		1	one instance, the record of the test did not indicate what test standard was used.	
			(equipment record checked 03PIS10) • In one instance, the record of the test indicated	
			the calibration standard used, however, it was different than the calibration standard	
		1	listed in the test document. (The test record did not indicate why a different calibration	
Low		PSR Mechanical Integrity	standard was used).	PSR Mechanical Integrity PEI
			A PSM Incident Investigation report had a documented investigation start date greater	
			than 48 hours following the incident. Records of the investigation showed the	Review all PSM Investigation
Compliance	e	PSM Incident Investigation report	investigation began within two hours of the incident.	Reports dating back to 2006



Action Required	Action Taken		Target Date - Julian	# Of Due Date Changes
Incorporate the fire prevention and protection requirement of 35' into the hot work permit within our electronic permit system. Assigned to Tommy Braaten with 12/1/2012 due date.	moved to 576593 due to incorrect entry into FAM as Cat 2	12/1/2012	12/1/2012	
Audit PEI Test and Inspection records to assure requirements of WAC 296-67-037 and 40 CFR 68.73(d)(4) are being fully complied with. Report results of the audit to the Technical Assurance Manager. For any findings identified, create subsequent Fountain action item to address the finding. Assigned to Dean Overman with 7/10/2012 due date	See 576588	7/10/2012	7/10/2012	
Audit MEI Test and Inspection records to assure requirements of WAC 296-67-037 and 40 CFR 68.73(d)(4) are being fully complied with. Report results of the audit to the Technical Assurance Manager. For any findings identified, create subsequent Fountain action item to address the finding. Assigned to Jaylynn Jackson with 7/10/2012 due date.	see 576617	7/10/2012	7/10/2012	
Incorporate the fire prevention and protection requirement of 35' into the hot work permit within our electronic permit system. Assigned to Tommy Braaten with 12/1/2012 due date.	Complete	12/1/2012	12/1/2012	
Audit PEI Test and Inspection records to assure requirements of WAC 296-67-037 and 40 CFR 68.73(d)(4) are being fully complied with. Report results of the audit to the Technical Assurance Manager. For any findings identified, create subsequent Fountain action item to address the finding. Assigned to Dean Overman with 7/10/2012 due date	i reviewed both WAC and 40 CFR paragraphs regarding this item. The PEI Inspection Data Management System (IDMS) meets all the requirements as outlined in each regulation referenced paragraph. See attachment of sample report from IDMS and the mapping to each requirement in the paragraphs. No further action required.	7/10/2012	7/10/2012	
Audit PEI Test and Inspection records to assure requirements of WAC 296-67-037 and 40 CFR 68.73(d)(4) are being fully complied with. Report results of the audit to the Technical Assurance Manager. For any findings identified, create subsequent Fountain action item to address the finding. Assigned to Dean Overman with 7/10/2012 due date	Since the audit, we have asked the I&E technicains to properly fill out thier IPF testing documents, so we can can in compliance with WAC 296-67-037 and 40 CFR 68.73(d)(4). On June 4th, Ken patnode and I performed on audit for eight testing documents to see if the technicians are completing the information. Below are the test procedures: 1PIS22A, 3PIS10, 11PIS07, 12PIS03A&B, 6PIS02A, 16PIS06, and 16PIS09. All these test procedures were filled out properly and are in compliance with WAC 296-67-037 and 40 CFR 68.73(d)(4). The IPF Specialist will continue to perform spot audits as he receives future test reports. Action item is complete and will be closed.		7/10/2012	
Review all PSM Investigation Reports dating back to 2006 and insure/document that the initial data gathering for the incident occurred within 48 hours of the incident. This initial data gathering date should be documented on all investigation reports. In early 2014, the Incident Investigation Report Template was modified to include the date that initial data was gathered. This date is in addition to the chartered investigation start date.		6/1/2015	6/1/2015	



	Target Date Changed by (Personnel)	Reason for Target Date Change	Date Completed (Action) - Julian	Date Closed - Julian	Status Assurance (Action Item)	Past Due Action Item?	Assurance Reference Number	Assessment (Closed Date)	Attachment Count (Actions)	Reopenedyn	Plan ID	Line Manager of Auditee
			1/23/2012	1/23/2012	Closed	No	2011 PSM/RMP Compliance Audit	23/01/2012 20:26:30		1 N		
							2011 PSM/RMP					
,			1/23/2012	1/23/2012	Closed	No	Compliance Audit	23/01/2012 20:26:30		1 N		
							2011 PSM/RMP					
			1/23/2012	1/23/2012	Closed	No		23/01/2012 20:26:30		1 N		
			10/29/2012	10/29/2012	2 Closed	No	2011 PSM/RMP Compliance Audit			1 N		
			4/0/2012	2 4/9/2012	Clased	No	2011 PSM/RMP Compliance Audit			3 Y		
			4/9/2012	4/9/2012	Closed	INO	Compliance Addit			311		
							2011 PSM/RMP					
			1/23/2012	6/5/2012	Closed	No	Compliance Audit			0 Y		
							PSM/RMP Regulatory					
					Open	No	Compliance			1		

